

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

RACHEL RAMSBOTTOM,
ALEXIS BOWLING

Plaintiffs,

v.

LORIN ASHTON,
AMORPHOUS MUSIC, INC.,
BASSNECTAR TOURING, INC.,
REDLIGHT MANAGEMENT, INC.,
C3 PRESENTS, L.L.C,
INTERACTIVE GIVING FUND,

Defendants.

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: CIVIL ACTION NO. 3:21-cv-00272
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: JURY TRIAL DEMANDED
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**PLAINTIFFS' MOTION TO EXTEND TIME TO FILE CERTIFICATES OF GOOD STANDING
FOR BRIAN D. KENT, ESQ. AND M. STEWART RYAN, ESQ. AND MOTION FOR *PRO HAC*
VICE ADMISSION OF ALEXANDRIA MACMASTER, ESQ.**

Plaintiffs, Rachel Ramsbottom and Alexis Bowling hereby move the Court for an extension of time to file certificates of good standing for Brian D. Kent, Esq. and M. Stewart Ryan, Esq. and a motion for the *pro hac vice* admission of Alexandria MacMaster. In support of this motion, Plaintiffs state:

Certificates of Good Standing for Mr. Brian D. Kent, Esq. and M. Stewart Ryan, Esq.

1. This matter was initiated by the filing of a Complaint on April 5, 2021.
2. On April 6, 2021, a notification was received directing that motions for the *pro hac vice* admission of Mr. Brian D. Kent, Esq., Mr. M. Stewart Ryan, Esq., and Ms. Alexandria MacMaster, Esq. be filed not later than April 27, 2021.
3. On April 7, 2021, Plaintiffs filed a Motion for the *pro hac vice* admission of Brian D. Kent, Esq. Mr. Kent has been admitted to the bar of the United States District Court (USDC), Eastern District of Pennsylvania (EDPA). Mr. Kent is a member of good standing of the Supreme Court of Pennsylvania.

4. On April 7, 2021, Plaintiffs filed a Motion for the *pro hac vice* admission of M. Stewart Ryan, Esq. Mr. Ryan has been admitted to the bar of the EDPA. Mr. Ryan is a member of good standing of the Supreme Court of Pennsylvania.

5. On April 12, 2021, a notice was received that the Motions for the *pro hac vice* admission of Brian D. Kent, Esq. and M. Stewart Ryan, Esq. must be accompanied by Certificates of Good Standing within ten (10) days.

6. Prior to the filing of the Motions for the *pro hac vice* admission of Brian D. Kent, Esq. and M. Stewart Ryan, Esq. counsel was making efforts to obtain Certificates of Good Standing for Mr. Kent and Mr. Ryan so as to accompany the filing of those motions and comply with the applicable local rules.

7. Due to COVID-19 restrictions, the EDPA has temporarily suspended certain operations and, upon information and belief, many support staff remain working remotely. Since receipt of the notification of April 12, 2021, counsel has continued to make efforts to obtain Certificates of Good Standing.

8. On April 14, 2021 and April 19, 2021 counsel attempted to contact the EDPA Clerk of Court by phone to inquire as to the status of the Certificates of Good Standing for Mr. Kent and Mr. Ryan. All operators were unavailable, and counsel left a voice message on both occasions.

9. On April 20, 2021, an email was sent to EDPA to inquire as to the status of the Certificates of Good Standing for Mr. Kent and Mr. Ryan. To date, there has been no response from the EDPA Clerk of Court as to the status of the Certificates of Good Standing for Mr. Kent and Mr. Ryan or when same can be reasonably expected.

10. Plaintiffs believe an extension until June 15, 2021 will provide adequate time for the receipt and filing of the Certificates of Good Standing for Mr. Kent and Mr. Ryan.

Motion for the *Pro Hac Vice* admission of Alexandria MacMaster, Esq.

11. The current deadline for Ms. MacMaster to file a motion for *pro hac vice* admission is April 27, 2021.

12. Ms. MacMaster is a member of good standing of the Supreme Court of Pennsylvania.
13. On or about April 12, 2021, Ms. MacMaster submitted her application for admission to the bar of the USDC, Eastern District of Pennsylvania (EDPA).
14. Due to COVID-19 restrictions, the EDPA has temporarily suspended in-person attorney admission ceremonies and all applications are currently being processed via mail.
15. On April 14, 2021 and April 19, 2021 counsel attempted to contact the EDPA Clerk of Court by phone to inquire as to the current processing time for attorney admission applications. All operators were unavailable, and counsel left a voice message on both occasions.
16. On April 20, 2021, Plaintiff emailed the EDPA Clerk's Office to again inquire as to processing time for attorney admission applications.
17. To date, counsel has not received a response from the EDPA Clerk of Court as to when Ms. MacMaster's admission to the EDPA can be reasonably expected.
18. Plaintiffs believe an extension until June 30, 2021 will provide adequate time for the processing of Ms. MacMaster's admission.

WHEREFORE, for the reasons articulated herein, Plaintiffs respectfully requests (1) an extension of time until June 15, 2021 to file Certificates of Good Standing for Brian D. Kent, Esq. and M. Stewart Ryan, Esq. and (2) an extension of time until June 30, 2021 to file a motion for the *pro hac vice* admission of Alexandria MacMaster.

By: */s/ Phillip Miller*

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**pro hac vice application pending*

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of April 2021, I electronically filed the foregoing Plaintiffs' Motion To Extend Time To File Certificates Of Good Standing For Brian D. Kent, Esq. and M. Stewart Ryan, Esq. and Motion For Pro Hac Vice Admission Of Alexandria Macmaster, Esq. with the Clerk of Court using CM/ECF system, which will send notification of such filing to the following:

Russell B. Morgan
Jason C. Palmer
Rachel Sodée
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The foregoing motion was sent via electronic mail to the following:

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*Attorney for Lorin Ashton, Amorphous Music Inc.,
and Bassnectar Touring, Inc.*

/s/ Phillip Miller

Phillip Miller, Esquire